



**VIRGIN ISLANDS DEPARTMENT OF JUSTICE**  
**OFFICE OF THE ATTORNEY GENERAL**

February 8, 2024

**Via CM/ECF Filing**

Hon. Arun Subramanian, United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**RE: Letter-Motion Requesting Extension of Time**  
***Doe I, et al. v. Government of the United States Virgin Islands, et al.***  
**Case No. 1:23-cv-10301 AS**

Dear Judge Subramanian:

I am the Chief of the Civil Division in the United States Virgin Islands Department of Justice, Office of the Attorney General. I represent Defendants the Government of the Virgin Islands (“GVI”), former Governor Kenneth Mapp (“Mapp”) in his official capacity, and former Attorney General Vincent Frazer (“Frazer”) in his official capacity, and file this request for the limited purposes set forth below.

**Request for Extension of Time until March 8, 2024:** The Government Defendants contest whether they have been served and/or properly served and thus take the position that there is currently no set deadline for a responsive pleading. However, in an abundance of caution, I respectfully request until March 8, 2024 to file a (single) responsive pleading on behalf of Defendants GVI, Mapp, and Frazer. These Defendants have not previously requested an extension, and an extension is sought to permit coordination and consultation with my clients and to respond fully to the allegations in the First Amended Complaint. Plaintiffs consent to this request for an extension upon the Government’s agreement to extend a similar courtesy to them in responding to its filing. The case is set for an initial pretrial conference on May 3, 2024.

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**St. Thomas**

3438 Kronprindsens Gade | GERS Complex, 2nd Floor | St. Thomas, VI 00802-5749 | (340) 774-5666  
Division of Paternity & Child Support | 8000 Nisky Shopping Center | 2nd Floor, Suite 500 | St. Thomas, VI 00802 | (340) 775-3070

**St. Croix**

213 Estate La Reine | Kingshill, St. Croix, VI 00850 | (340) 773-0295  
Division of Paternity & Child Support | 3018 Orange Grove, Suite 4 | Christiansted, St. Croix, VI 00821 | (340) 775-3070

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**Request to File A Single 40-Page Motion to Dismiss o/b/o Three Government Defendants:** The Government also requests to file a single forty (40) page memoranda of law on behalf of Defendants GVI, Mapp, and Frazer. Plaintiffs consent to this extension, again upon the Government's agreement to extend a similar courtesy to them in their response.

Defendants GVI, Mapp, and Frazer do not waive any defenses, including as to the adequacy of service, or submit to the jurisdiction of this Court, by making these requests.

Thank you in advance for your consideration.

Respectfully Submitted,

/s/ Venetia H. Velazquez

Venetia Velazquez

Defendants request is GRANTED. However, the Court has observed that longer briefs are usually worse briefs. Counsel should make every effort to file a concise brief as close to 20 pages as possible, and as an incentive, plaintiffs' responsive brief will be limited to the pages defendants used. The Clerk of Court is directed to terminate the motion at ECF No. 42.

SO ORDERED.



Arun Subramanian, U.S.D.J.

Date: February 12, 2024